

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al., <sup>1</sup>	)	Case No. 01-01139 (KJC)
	)	(Jointly Administered)
Reorganized Debtors.	)	
_____	)	<b>Re: Docket Nos. 31812, 31856, 31873, 32044, 32068, 32233, 32324, 32503, 32560</b>

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING  
STIPULATION FOR BRIEFING SCHEDULE AND HEARING DATE  
FOR ANDERSON MEMORIAL HOSPITAL'S MOTION TO ALTER  
OR AMEND ORDER DENYING MOTION FOR CLASS CERTIFICATION**

1. On March 5, 2014, Anderson Memorial Hospital (“AMH”) filed its Motion to Alter or Amend Order Denying Motion for Class Certification and for Entry of Scheduling Order and Granting Related Relief (the “Motion”) [Docket No. 31812]<sup>2</sup>.

2. On March 18, 2014, the Court entered the Order Approving Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital’s Motion to Alter or Amend Order Denying Motion for Class Certification (the “Order”) [Docket No. 31873].

3. On October 6, 2014, the Court entered the Amended Order Approving Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital’s Motion to Alter or Amend Order Denying Motion for Class Certification (the “Order”) [Docket No. 32417].

4. On April 15, 2015, a hearing on the Motion was held. On May 5, 2015, the Court entered the Order Regarding Anderson Memorial Hospital’s Discovery Request and directing the

---

<sup>1</sup> The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and W. R. Grace & Co.-Conn. At the time of filing of AMH’s Motion, there were 62 debtors. On March 19, 2014, Grace filed and the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Merged Subsidiaries. [Docket No. 31880] On September 16, 2014, Grace filed a motion closing the Chapter 11 cases of certain additional Grace subsidiaries, and on October 14, 2014, the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Grace subsidiaries. [Docket No. 32429] Accordingly, Grace and Grace-Conn. are the surviving Reorganized Debtors.

<sup>2</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

parties to submit a proposed scheduling order regarding the filing of briefs on the issue of class certification [Docket No. 32560].

5. Reorganized Debtors W. R. Grace & Co., et al. and AMH have entered into a Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Stipulation"). Among other things, the proposed Stipulation gives relief from the page limitations found in Local Rule 7007-2.

6. Attached hereto as Exhibit A is a copy of a proposed form of Order Approving Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Order"). A copy of the Stipulation is attached to the Order as Exhibit 1 thereto.

7. By way of this certification, the Reorganized Debtors respectfully request that the Court enter the Order if acceptable to the Court, thereby approving the terms of the Stipulation.

8. Counsel for the parties are available, should the Court have any questions or concerns with the foregoing or the Amended Order.

Dated: June 5, 2015

KIRKLAND & ELLIS LLP  
John Donley  
Lisa Esayan  
300 North LaSalle Street  
Chicago, IL 60654  
Telephone: (312) 862-2000

and

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Laura Davis Jones (Bar No. 2436)

James E. O'Neill (Bar No. 4042)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Co-Counsel for the Reorganized Debtors